

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE:

PRO SOUTH, INC.,

Debtor.

§ Case No. 19-42427

§ Chapter 11

§ Date of Hearing/Nature:

§ January 21, 2020

§ Debtor's Emergency Motion for Use of Cash

§ Collateral [Dkt. 10]

§

REGIONS BANK'S WITNESS AND EXHIBIT LIST

WITNESS

At the hearings, Regions Bank may call the following persons to testify as witnesses:

1. Any witness designated by any other party.

EXHIBITS

At the hearing, Regions Bank may present one or more of the following exhibits:

<u>Ex.</u>	<u>DESCRIPTION OF EXHIBIT</u>	<u>Offered</u>	<u>Objection</u>	<u>Admitted</u>
A.	First Notice of Default pursuant to <i>Second Interim Order on Motion the Use of Cash Collateral Pursuant to Sections 105, 361, 362, and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(b)</i> [Doc. No. 39] dated November 15, 2019			
B.	Second Notice of Default pursuant to <i>Second Interim Order on Motion the Use of Cash Collateral Pursuant to Sections 105, 361, 362, and 363 of the Bankruptcy Code and Federal Rule of Bankruptcy Procedure 4001(b)</i> [Doc. No. 39] dated December 2, 2019			
C.	Notice of Default pursuant to Settlement Agreement, dated December 12, 2019			
D.	Debtor's Monthly Operating Report for Filing Period September 2019 [Doc. No. 57]			

<u>Ex.</u>	<u>DESCRIPTION OF EXHIBIT</u>	<u>Offered</u>	<u>Objection</u>	<u>Admitted</u>
E.	Debtor's Monthly Operating Report for Filing Period October 2019 [Doc. No. 60]			
F.	Debtor's Amended Monthly Operating Report for Filing Period October 2019 [Doc. No. 69]			
G.	Debtor's Monthly Operating Report for Filing Period November 2019 [Doc. No. 70]			
H.	Emailed from Rod Kagy to Regions dated January 15, 2020			
I.	13-Week Cash Flow Projections Emailed to Regions by Rod Kagy on January 15, 2020			
J.	Any exhibit identified by any other party			

Regions Bank reserves the right to call or to introduce one or more, or none, of the witnesses and exhibits listed above, and reserves the right to call additional witnesses and introduce additional exhibits in rebuttal. Regions Bank further reserves the right to supplement this list prior to the hearing.

Dated: January 16, 2020

Respectfully submitted,

/s/ George H. Barber

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**ATTORNEYS FOR REGIONS BANK**

### **CERTIFICATE OF SERVICE**

This is to certify that on January 16, 2020, a true and correct copy of the foregoing pleading was served, (1) by ECF service on all entities receiving ECF service and (2) by email to counsel for the debtors and the Office of the United States Trustee at the email address stated below.

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